

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-195-E**

IN RE: South Carolina Energy Freedom Act)
(H.3659) Proceeding Related to)
Duke Energy Carolinas, LLC for the)
Commission to Establish Reasonable)
Guidelines to Ensure Reasonable)
Interconnection Timelines, Including)
Time Requirements to Deliver a Final)
System Impact Study to All)
Interconnection Customers that Execute)
a System Impact Study Agreement - S.C.)
Code Ann. Section 58-27-460-(D))

**PETITION
TO
INTERVENE**

This Commission established Commission Docket 2019-196-E, on June 4, 2019, for this Commission to establish reasonable guidelines, related to Duke Energy Carolinas, LLC, (“DEC” or the “Company”) to ensure reasonable interconnection timelines, including time requirements to deliver a final system impact study to all interconnection customers that execute a System Impact Study Agreement, pursuant to S.C. Code Ann., Section 58-27-460(D).

Petitioner herein is Ecoplexus Inc., (“Ecoplexus” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. Ecoplexus is a Delaware Corporation, domesticated by the South Carolina Secretary of State’s Office to conduct business in South Carolina. Ecoplexus maintains an office at 600 Park Office Dr., Suite 285, Durham, North Carolina 27709 in addition to locations in San Francisco and Dallas.

2. Ecoplexus is a leader in the development, design, engineering, construction, financing, operations and ownership of renewable energy systems for the commercial, government and utility markets. Ecoplexus develops, builds, owns and operates clean energy projects and has completed, or has in construction, over 400 megawatts of utility-scale renewable generation facilities in North America.

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3. Ecoplexus is financially impacted by this Commission's decisions in this Docket, as is outlined in more detail hereinbelow.

4. Specifically, Ecoplexus is a developer of renewable energy projects in South Carolina in DEC's assigned territory.

5. Specifically, the grounds for the Petition are that Petitioner conducts business with DEC and has a material interest in the subject matter of this Docket.

6. This Commission is establishing reasonable guidelines related to DEC, to ensure reasonable interconnection timelines, including time requirements to deliver a final system impact study to all interconnection customers that execute a System Impact Study Agreement, pursuant to S.C. Code Ann. Section 58-27-460(D).

7. As outlined hereinabove, Ecoplexus has substantial business interests in DEC's assigned territory in South Carolina.

8. Petitioner's position is that Ecoplexus is an interested party and it has a direct and substantial interest in the decisions to be made by this Commission in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Ecoplexus will be impacted by this Commission's decisions upon its review, outlined hereinabove. Therefore, the decisions of this Commission are important to the Petitioner from a financial standpoint. Petitioner's further position is that Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decisions to be conducted in this Docket.

9. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

10. The granting of Ecoplexus' Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

11. This Petition to Intervene is timely filed with this Commission.

12. Petitioner has previously received approval for intervention from this Commission, including Commission Docket 2018-202-E.

13. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

14. Ecoplexus is represented by counsel in this proceeding:

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CONCLUSION

WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,
/s/Richard L. Whitt

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August 12, 2019
Columbia, South Carolina

